

Congress of the United States
House of Representatives
Washington, DC 20515

June 17, 2011

Ms. Mary L. Schapiro, Chairman
U.S. Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

Mr. Ben S. Bernanke, Chairman
Board of Governors of the Federal Reserve
20th Street and Constitution Avenue, NW
Washington, DC 20551

Ms. Sheila C. Bair, Chairman
Federal Deposit Insurance Corporation
1776 F Street, NW
Washington, DC 20006

Mr. Edward DeMarco, Acting Director
Federal Housing Finance Agency
1700 G Street, NW, 4th Floor
Washington, DC 20552

Mr. John Walsh, Acting Comptroller
Office of the Comptroller of the Currency
250 E Street, SW
Washington, DC 20219

Mr. Shaun Donovan, Secretary
U.S. Department of Housing and Urban Development
451 7th Street, SW
Washington, DC 20410

Dear Chairman Schapiro, Chairman Bernanke, Chairman Bair, Acting Director DeMarco, Acting Comptroller Walsh, and Secretary Donovan:

We are writing concerning your notice of proposed rulemaking on the regulations to implement Section 941 of the Dodd-Frank Act which includes defining a Qualified Residential Mortgage (QRM) that will be exempt from the Act's risk retention requirements. We strongly urge you in this process to consider lower down payment loans that have mortgage insurance (MI) as constituting a QRM.


Section 941 of the Dodd-Frank Act specifically names "mortgage guarantee insurance" as one of the factors to be included in the QRM definition. The law recognizes that private capital does not exclusively come from a lender or an investor; it can be provided by a private mortgage insurer. The QRM regulations should reflect this important reality, which was Congress' intent in clarifying this point in the Act. As we seek to ensure sustainable home ownership supported by the private sector, it should not go unnoticed that loans with private mortgage insurance default less often than uninsured loans. Mortgage insurers provide additional scrutiny on a loan application, supplementing the lender's review. In addition, mortgage insurers have well-established procedures that have been shown to mitigate and cure loan deficiencies. These safeguards protect lenders and investors while keeping families in their homes. This is important to consider as we seek ways to create sustainable home ownership opportunities for Americans through the private sector with less reliance on government-supported mortgage finance products.

The proposal to require a minimum 20 percent down payment requirement under the QRM definition would reduce the availability of affordable mortgage capital for otherwise qualified consumers. In fact, in 2009 when underwriting standards had already been significantly tightened, the majority of homes were purchased with less than a 20 percent down payment. An unnecessarily strict QRM definition would particularly harm first-time and minority homebuyers. Creditworthy first-time homebuyers would be priced out of the market, as evidenced by a survey by the National Association of Realtors that found in 2010, 86 percent of first-time homebuyers made down payments below 20 percent. The resultant reduction in demand for housing, due to an overly burdensome government dictate, would only add to the challenges the housing market faces, and could threaten a full-fledged economic recovery from years to come.

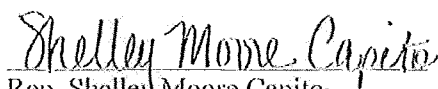
Other overly proscriptive elements of the proposal regarding credit history are best left in the context of establishing broad underwriting standards and principles. We are concerned, for example, that the proposed regulation establishes overly-narrow debt-to-income guidelines last seen more than a generation ago that would further reduce access to credit for a broad range of Americans. Furthermore, this could have the unintended consequence of pushing borrowers to Federal Housing Administration (FHA) insured loans. The FHA is already playing too large of a role in mortgage market and we should not institute policies that could exacerbate the problem.

We urge you to revise the proposed rule to reflect the intent of Congress by including prudently underwritten privately insured loans within the QRM definition. We thank you for your consideration and look forward to your timely response.

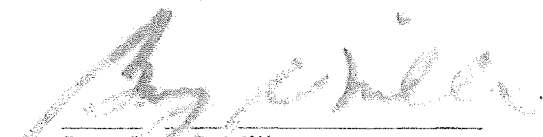
Sincerely,


Rep. John Campbell

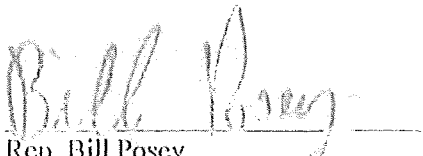

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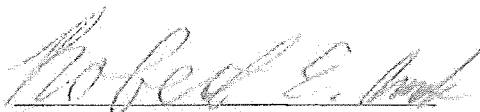

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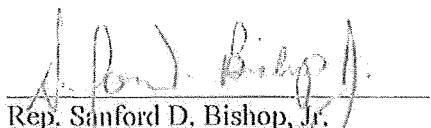

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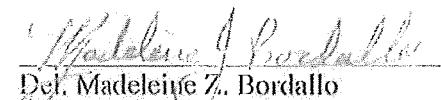

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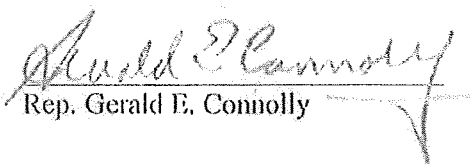

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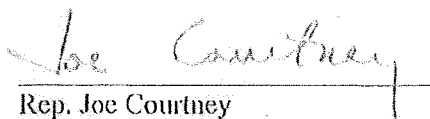

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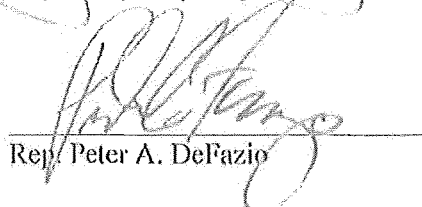

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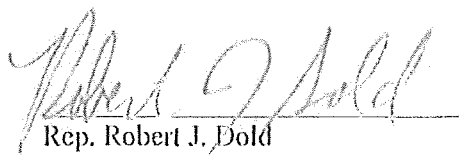

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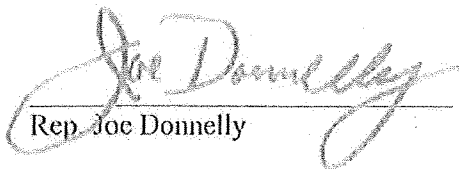

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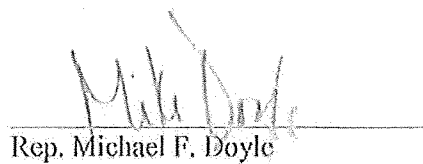

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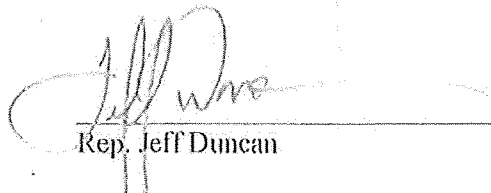

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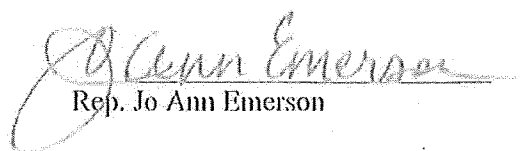

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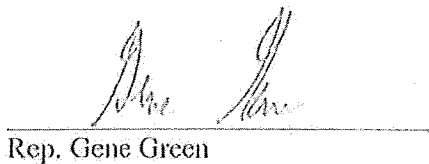

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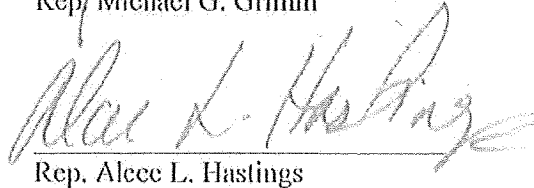

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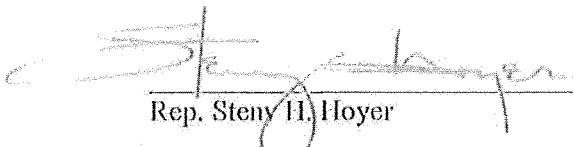

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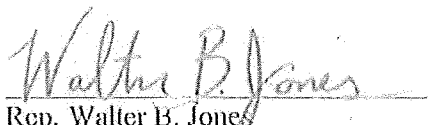

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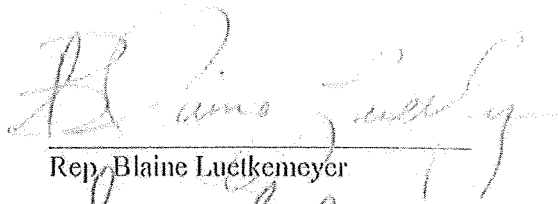

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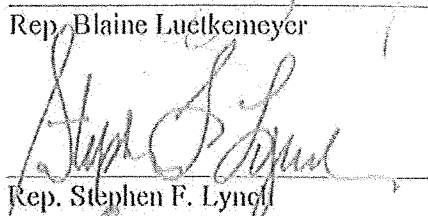

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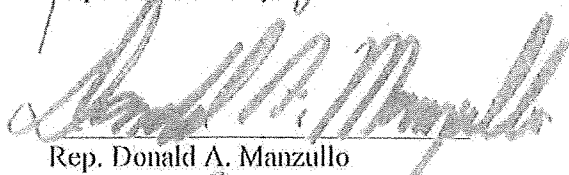

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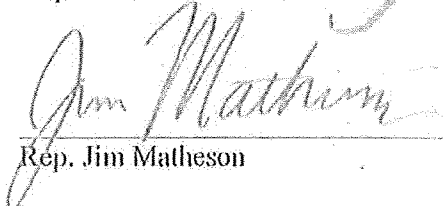

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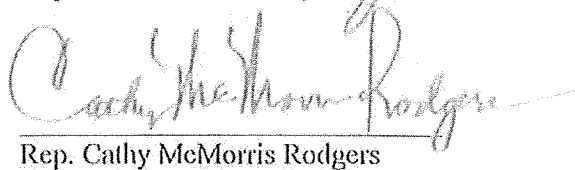

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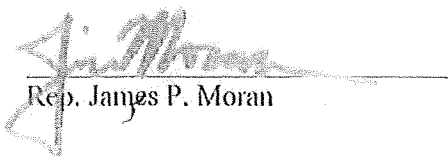

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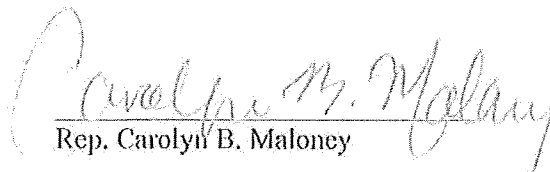

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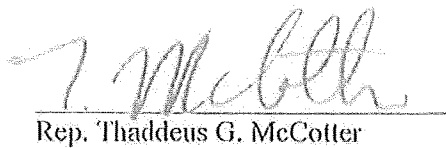

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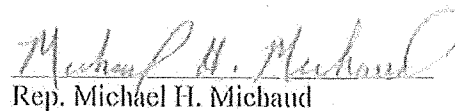

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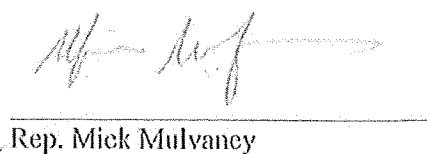

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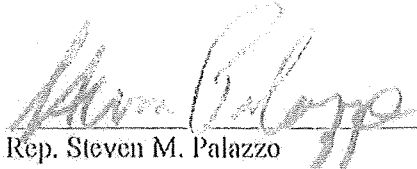

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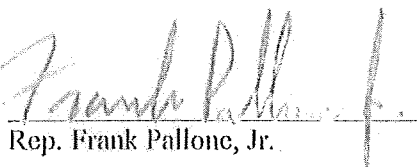

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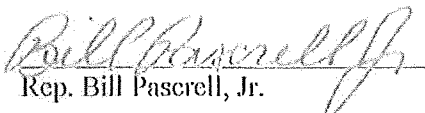

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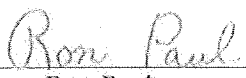

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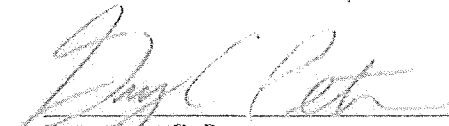

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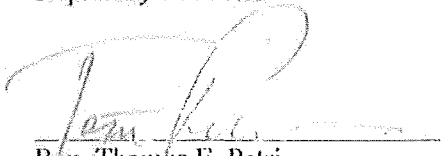

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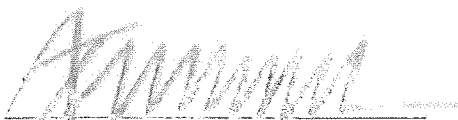

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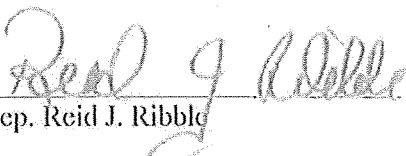

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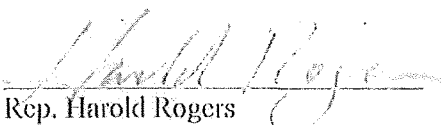

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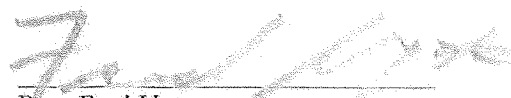
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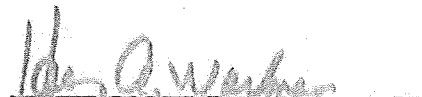
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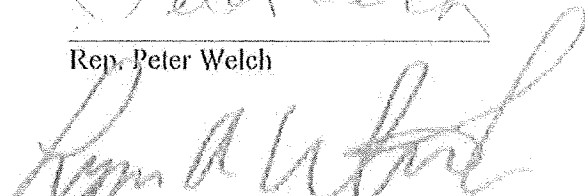

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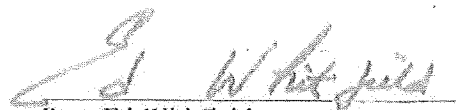

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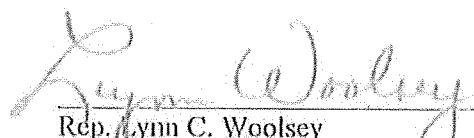

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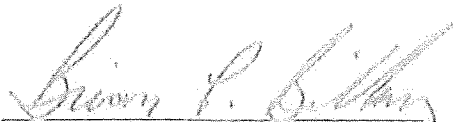

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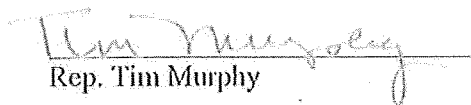

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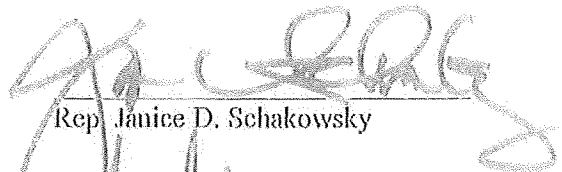

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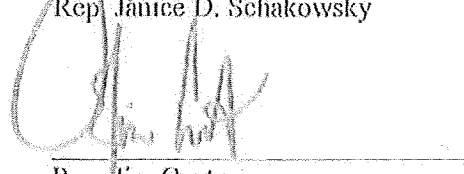

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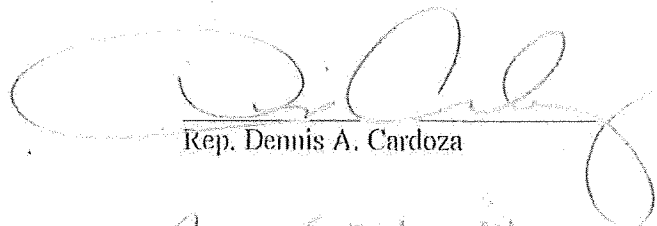

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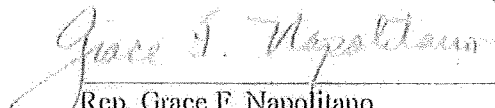

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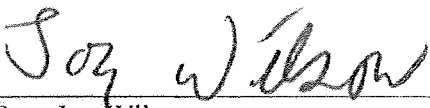

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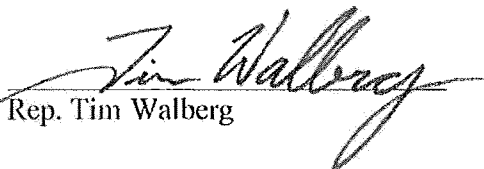

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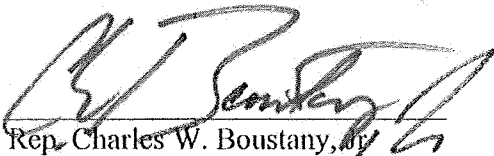

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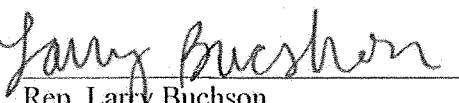

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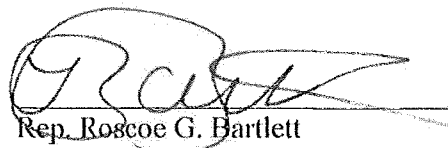

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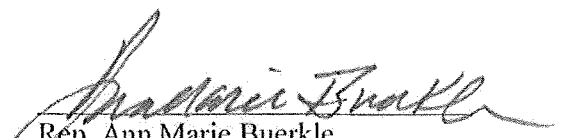

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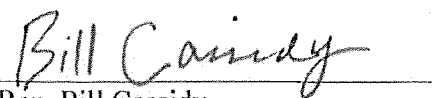

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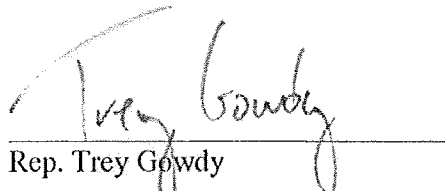

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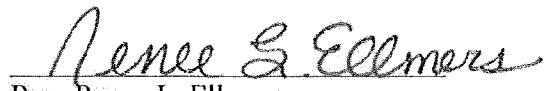

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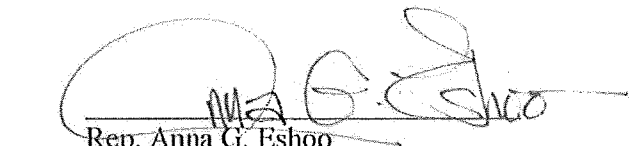

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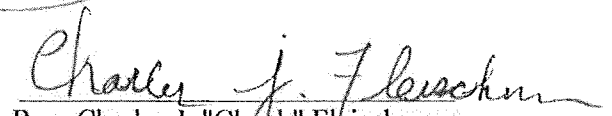

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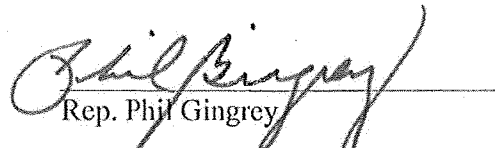

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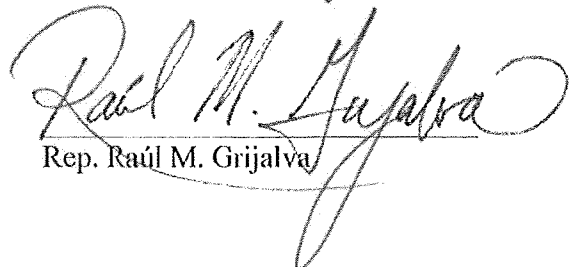

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Rep. Raúl M. Grijalva



Rep. Frank C. Guinta



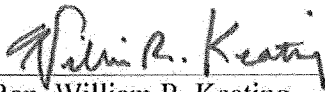
Rep. Richard L. Hanna



Rep. Tim Huelskamp



Rep. Steve Israel



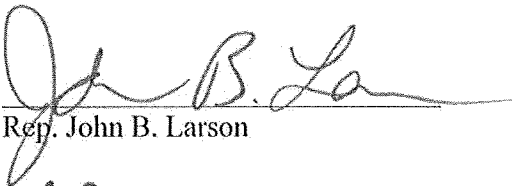
Rep. William R. Keating



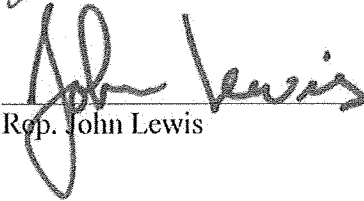
Rep. Larry Kissell



Rep. Leonard Lance



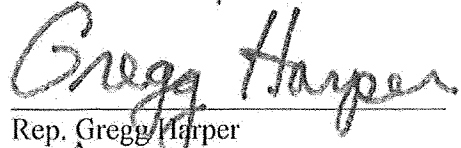
Rep. John B. Larson



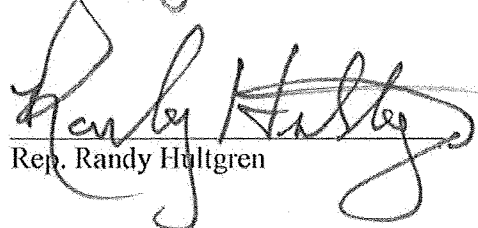
Rep. John Lewis



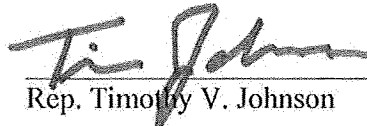
Rep. Colleen W. Hanabusa



Rep. Gregg Harper



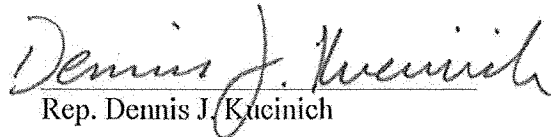
Rep. Randy Hultgren



Rep. Timothy V. Johnson



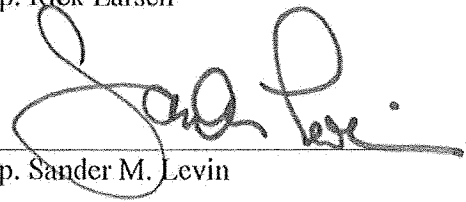
Rep. Dale E. Kildee



Rep. Dennis J. Kucinich




Rep. Rick Larsen

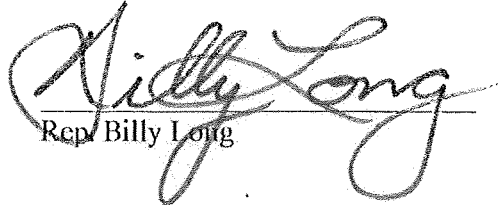



Rep. Sander M. Levin



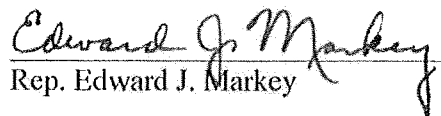
Rep. Frank A. LoBiondo


Rep. David Loebbeck


Rep. Billy Long

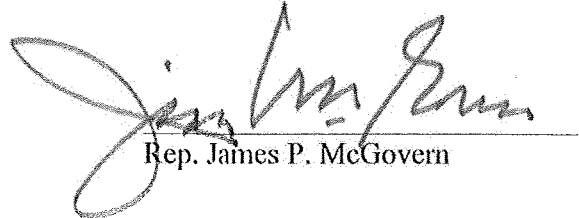

Rep. Frank D. Lucas


Rep. Tom Marino


Rep. Edward J. Markey

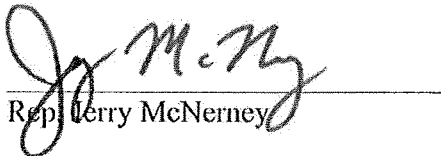

Rep. Doris O. Matsui


Rep. Michael T. McCaul

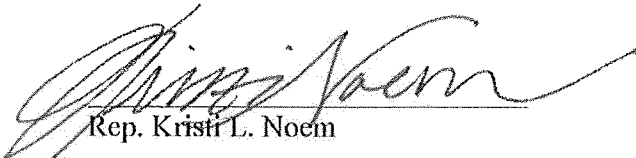

Rep. James P. McGovern

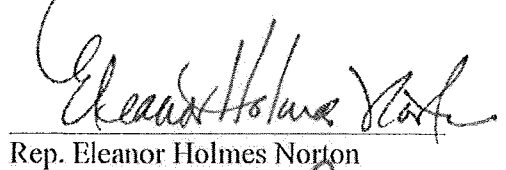

Rep. Mike McIntyre


Rep. Howard P. "Buck" McKeon

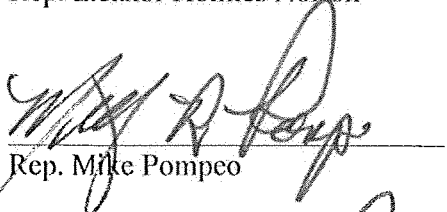

Rep. Terry McNerney


Rep. Sue Wilkins Myrick

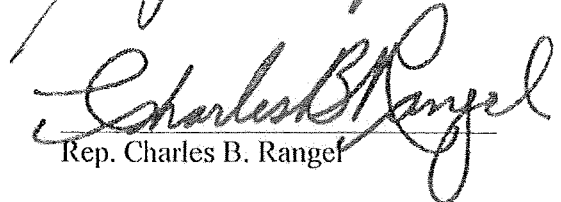

Rep. Kristi L. Noem


Rep. Eleanor Holmes Norton


Rep. Pete Olson


Rep. Mike Pompeo

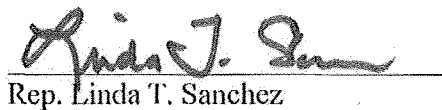

Rep. David E. Price


Rep. Charles B. Rangel


Rep. Denny Rehberg

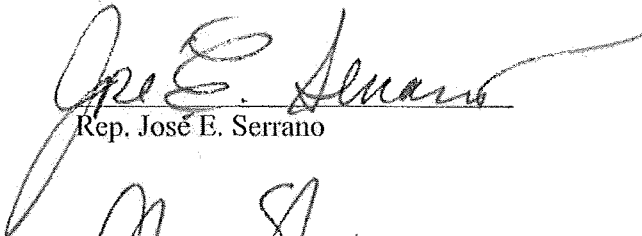

Rep. Silvestre Reyes

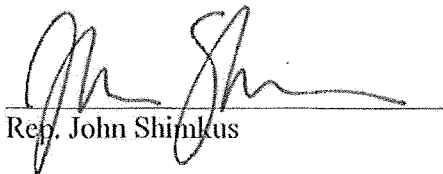

Rep. Todd Rokita

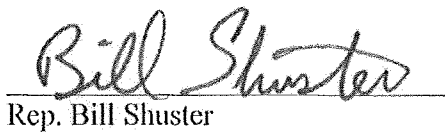

Rep. Linda T. Sanchez


Rep. Steve Scalise



Rep. Aaron Schock

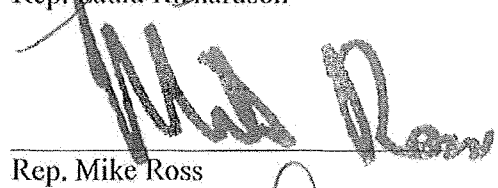

Rep. José E. Serrano

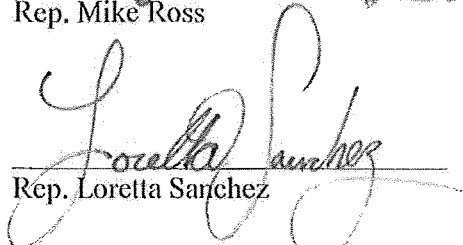

Rep. John Shimkus

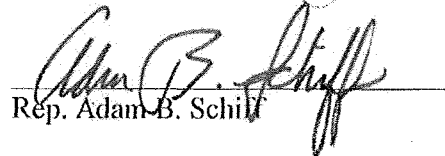

Rep. Bill Shuster


Rep. David G. Reichert

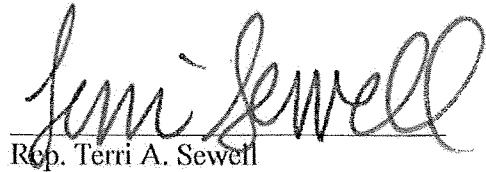

Rep. Laura Richardson


Rep. Mike Ross

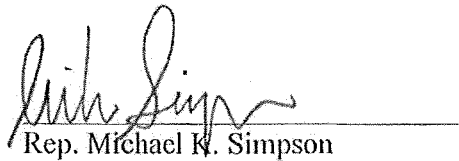

Rep. Loretta Sanchez


Rep. Adam B. Schiff

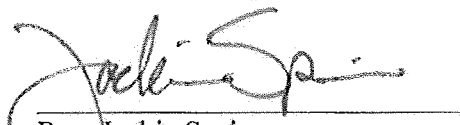

Rep. Austin Scott


Rep. Terri A. Sewell



Rep. Heath Shuler



Rep. Michael K. Simpson


Rep. Albio Sires

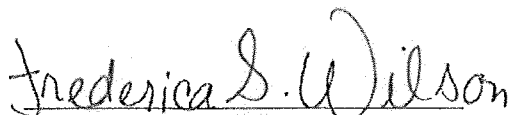

Rep. Jackie Speier

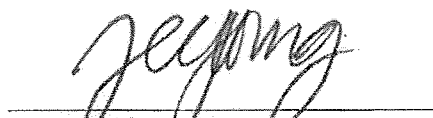

Rep. Glenn Thompson


Rep. Scott R. Tipton



Rep. Edolphus Towns



Rep. Virginia Foxx


Rep. Frederica S. Wilson

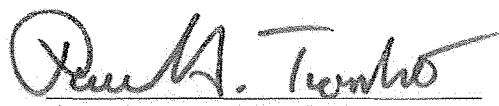

Rep. Todd C. Young



Rep. Dan Lungren



Rep. Adrian Smith



Rep. Fortney Pete Stark


Rep. Mike Thompson

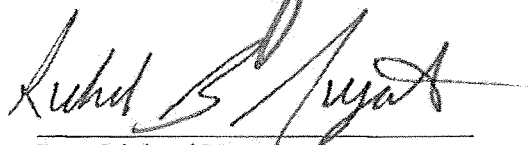

Rep. Paul Tonko


Rep. Niki Tsongas


Rep. Daniel Webster


Rep. Steve Womack



Rep. Mike Conaway


Rep. Richard Nugent



Rep. Marsha Blackburn



Rep. Cliff Stearns



Rep. C.A. Dutch Ruppersberger

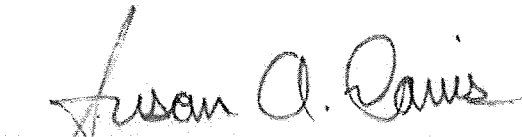

Rep. Jay Inslee


Rep. Lou Barletta



Rep. Mary Hono Mack



Rep. Dan Boren

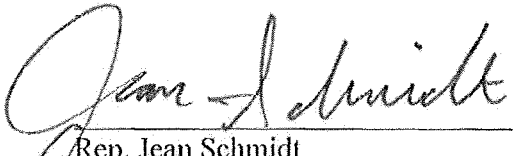

Rep. Ander Crenshaw


Rep. Susan A. Davis



Rep. Lloyd Doggett


Rep. Bob Goodlatte



Rep. Stevan Pearce

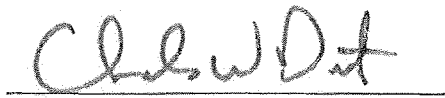

Rep. Jean Schmidt


Rep. Robert A. Wittman


Rep. David Wu


Rep. Norman Dicks


Rep. Jerrold Nadler


Rep. Charles W. Dent